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October 11, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for Authorization to
Provide In-Region, InterLATA Service in the States of
Colorado, Idaho, Iowa, Montana, Nebraska, North
Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing in response to questions raised by Commission staff in connection with Qwest’s Billing Output Specifications (“BOS”) format.

Qwest provides CLECs with Wholesale bills in a variety of formats, including BOS. On April 19, 2002, Qwest notified CLECs that it would make available Wholesale UNE-P bills in BOS format with a target production date of July 1, 2002. Currently, only one CLEC – AT&T – has requested and receives its UNE-P bills in a BOS format. Qwest is in the process of modifying its systems so that it can bill unbundled loops in BOS format as well. Qwest expects to deploy this capability for analog loops in the October 26, 2002, CRIS release, and for digital loops in the December 31, 2002, CRIS release.¹

In the Qwest I and Qwest II proceedings, Qwest submitted an ex parte filing describing its experience issuing UNE-P bills in BOS format in July and August, 2002.² In that ex parte filing, Qwest discussed the issues raised in its most recent release of BOS,

¹ CRIS release dates in this letter refer to the dates on which particular capabilities will be installed in Qwest’s billing systems. Although these capabilities are scheduled to become effective a few days after the release date, they may not be reflected fully in the bills until the next bill cycle. For instance, releases in December may be reflected beginning with the January bills.

² See Qwest 09/04/02b Ex Parte (Response to WCB on issues related to July and August BOS UNE-P bills) (“BOS Ex Parte”).

and, where appropriate, the measures Qwest undertook – or plans to undertake – to address those issues. This letter responds to Commission staff’s request that Qwest elaborate on some of those issues.

1. Summary of Monthly Charges/CSR Mismatch

Qwest previously explained that the summary of monthly charges on its BOS bills did not match the Customer Service Record (“CSR”) data in July.³ Ordinarily, the summary of monthly charges on the CLEC BOS bill is expected to match the total monthly charges that appear on the accompanying CSR.⁴ The mismatch condition that occurred in the Central region was caused by different dates being used to extract the bill and CSR data. For example, if a bill period ran from July 7 through August 6, this would have happened if bill data for that billing period was extracted on August 8 while CSR data was extracted on August 10. Because of this differing extraction date, service order activity that added or removed USOCs billing a monthly charge appeared in the CSRs but not in the bill data or vice-versa. Qwest implemented a manual process in August to ensure that there is a correct CSR for each account that bills. Qwest plans to automate this fix by extracting the bill and CSR data on the same day. This fix is scheduled to be included in the December 12, 2002, CRIS release.

2. Inclusion of All CSR Data

Qwest explained in the BOS Ex Parte that not all CSRs were provided in its July BOS bills.⁵ Because of the size of the data centers used to generate Wholesale bills in the Central region, Qwest relies on two sources for CSR data in that region.⁶ From July 7 through August 6, 2002, (the “seventh bill period”), the summary of monthly charges in the July BOS bills incorporated information from both of these sources; but, due to an administrative oversight, the CSR data gathered did not. Because a portion of the CSR data for the seventh bill period was not incorporated into the bill cycle, the summary of monthly charges and total CSR charges during that period did not match. Qwest identified this discrepancy very quickly and corrected it. As a result, the discrepancy did not affect the August bills. A process change was implemented and Qwest personnel monitored each bill period to ensure that CSR data was collected from both sources in the Central region. This process was mechanized beginning with the October bills, though Qwest still monitors the bills to ensure that all CSRs are present (because the data must pass through other systems before it reaches BOS). To further ensure that all CSRs are reflected in the

³ See *id.* at 3. The July mismatch between CSR data and summary charges described in the BOS Ex Parte occurred only in the Central region.

⁴ The CSR consists of all USOCs associated with CLEC working telephone numbers.

⁵ See *id.* at 2.

⁶ Qwest relies on only one data source for CSR information in the Western and Eastern regions.

BOS bill, Qwest will mechanize the flow of CSR data directly from CRIS to BOS on the bill pull day beginning with the December 12 CRIS release.

3. Directory Advertising Charges

In the BOS Ex Parte, Qwest noted that directory advertising charges were erroneously included in the monthly charge total in the July BOS bills. They should have been billed separately by Qwest to the end user advertiser. Qwest has since put in place a process whereby Qwest personnel run a monthly computerized search for directory advertising charges on CLEC BOS bills. If charges are found, they are removed from the CLEC bill prior to the bill cycle. Qwest expects to integrate this function into the Regional Invoice Biller, which is part of the CRIS release, on November 14, 2002, so that directory advertising charges are excluded automatically when CLEC bills are generated. It is worth noting that Qwest's sale of its directory advertising affiliate ("Qwest Dex") should eliminate this issue in most states because charges for directory advertising in the states in which Qwest Dex is sold no longer will be billed by Qwest.

4. Inclusion of Usage Rate

Qwest's BOS Ex Parte indicated that, in the Central region, Qwest did not always provide a usage rate in the July/August BOS bill.⁷ The "usage rate" refers to the per-minute charge for a particular type of service (*e.g.*, shared transport or interconnection service). The usage rate multiplied by an end user's minutes of use equals the interconnect or shared transport charges for that end user. The usage rate is separate from the USOC charge for a particular product or service. While in the July/August bills Qwest did not in all instances include the usage rate on the BOS bill, Qwest did provide on the bill minutes of use information and the total usage charge, which can be used to calculate the usage rate. Qwest will provide the usage rate on its BOS bills in all regions beginning with the December 12 CRIS release.

5. "From" and "Through" Dates for Fractionalized Charges

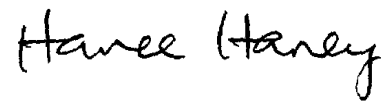
Fractionalized charges refer to charges for the portion of the month during which a product or service was provided. Qwest indicated in its BOS Ex Parte that it assessed fractionalized charges but did not indicate the "from" and "through" dates for those charges in the July/August BOS bills.⁸ The December 12 CRIS release will provide this information. For unbundled analog loops, "from" and "through" dates will be provided in the October 26 CRIS release.

⁷ See *id.* at 3.

⁸ See *id.*

The 20-page limit does not apply to this filing.

Respectfully Submitted,

A handwritten signature in black ink that reads "Hance Haney". The signature is written in a cursive, slightly slanted style.

Hance Haney

cc: E. Yockus
M. Carowitz
G. Remondino
R. Harsch
J. Jewel
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